

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**FREE SPEECH SYSTEMS, LLC,**

**Debtor.**

§  
§  
§  
§  
§

**Case No. 22–60043**

**Chapter 11  
Subchapter V**

---

**NOTICE OF DEPOSITION TO W. MARC SCHWARTZ**

---

**TO: W. Marc Schwartz  
c/o Shannon & Lee LLP  
Pennzoil Place – 13<sup>th</sup> Floor  
700 Milam  
Houston, TX 77002**

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30(b)(1) of the Federal Rules of Civil Procedure, applicable to this proceeding under Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine (“**Texas Plaintiffs**”) will conduct the oral deposition of W. Marc Schwartz (“**Mr. Schwartz**”) on **September 23, 2022 at 10:00 a.m.**, prevailing central time, at the law offices of Akin, Gump, Strauss, Hauer & Feld, LLP, 1111 Louisiana St., 44<sup>th</sup> Floor, Houston, TX 77002. The deposition shall be taken before a person duly authorized by law to administer oaths, and may be recorded by stenographic, audiographic, and/or videotaped means. The deposition shall continue from day to day thereafter or as otherwise agreed by the parties, until completed.

Dated: September 16, 2022

Respectfully submitted,

**MCDOWELL HETHERINGTON LLP**

Avi Moshenberg  
Texas Bar No. 24083532  
1001 Fannin Street, Suite 2700  
Houston, Texas 77002  
D: 713-337-5580  
F: 713-337-8850  
E: [Avi.Moshenberg@mhlhp.com](mailto:Avi.Moshenberg@mhlhp.com)

***Counsel for the Texas Plaintiffs***

and

**CHAMBERLAIN, HRDLICKA, WHITE,  
WILLIAMS & AUGHTRY, P.C.**

By: /s/ Jarrod B. Martin  
Jarrod B. Martin  
Texas Bar No. 24070221  
Tara T. LeDay  
Texas Bar No. 24083068  
1200 Smith Street, Suite 1400  
Houston, Texas 77002  
D: 713.356.1280  
F: 713.658.2553  
E: [jarrod.martin@chamberlainlaw.com](mailto:jarrod.martin@chamberlainlaw.com)  
E: [tara.leday@chamberlainlaw.com](mailto:tara.leday@chamberlainlaw.com)

***Bankruptcy Counsel for the Texas Plaintiffs***

**CERTIFICATE OF SERVICE**

This will certify that on September 16, 2022, a true and correct copy of the foregoing document was served via electronic transmission to all registered ECF users appearing in the case and will be sent via first-class, postage prepaid, United States mail on September 19, 2022 as follows:

W. Marc Schwartz  
c/o Shannon & Lee LLP  
Pennzoil Place – 13<sup>th</sup> Floor  
700 Milam  
Houston, TX 77002

Raymond William Battaglia  
Law Offices of Ray Battaglia, PLLC  
66 Granburg Circle  
San Antonio, TX 78218

Kyung Shik Lee  
Shannon & Lee LLP  
Pennzoil Place – 13<sup>th</sup> Floor  
700 Milam  
Houston, TX 77002

R.J. Shannon  
Shannon & Lee LLP  
Pennzoil Place – 13<sup>th</sup> Floor  
700 Milam  
Houston, TX 77002

/s/ Jarrod B. Martin  
Jarrod B. Martin